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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company (U39M) to Submit Its 2020 Risk Assessment Mitigation Phase Report.

Application 20-06-012

ASSIGNED COMMISSIONER'S SCOPING MEMO AND RULING

Summary

This Scoping Memo and Ruling sets forth the category, issues to be addressed, and schedule of the proceeding pursuant to Public Utilities (Pub. Util.) Code § 1701.1 and Article 7 of the Commission's Rules of Practice and Procedure.

1. Background

On June 30, 2020, Pacific Gas and Electric Company (PG&E) filed Application (A.) 20-06-012 to submit its Risk Assessment and Mitigation Phase (RAMP) Report pursuant to Decision (D.) 14-12-025.

PG&E's RAMP Report provides an initial quantitative and probabilistic assessment of PG&E's top 12 safety risks, plans to mitigate these risks, and estimates of costs associated with the proposed mitigations. The mitigation plans and cost estimates are informed by Risk Spend Efficiency (RSE) calculations and alternative mitigations that were also considered.

The RAMP Report follows the guidelines set forth in D.16-08-018 for what the RAMP submission should include, as well as the methodologies and new guidelines contained in the Safety Model Assessment Proceeding (S-MAP) Settlement Agreement that was approved in D.18-12-014.

The Commission's Safety Policy Division (SPD) is required to review PG&E's RAMP Report and issue an evaluation report. Parties shall then be given an opportunity to file comments to PG&E's RAMP Report and SPD's evaluation report. The RAMP filing and comment process shall then form the basis of PG&E's assessment and proposed mitigations for its safety risks in its next General Rate Case (GRC) filing.

A motion for party status was filed by FEITA Bureau of Excellence LLC (FEITA) on July 20, 2020. The motion was granted in the Administrative Law Judge (ALJ) ruling on July 31, 2020.

Protests to the application were filed by Mussey Grade Road Alliance (Mussey Grade) on July 29, 2020, The Public Advocates Office (Cal Advocates) and The Utility Reform Network (TURN) on August 5, 2020. PG&E filed a Reply to the protests on August 17, 2020.

Pre-filing Workshops were held on November 14, 2019, January 13, 2020, and February 4, 2020. Additional workshops after the application was filed were held on July 14, 2020, July 24, 2020, July 30, 2020, August 26, 2020, and August 27, 2020.

On September 24, 2020, prehearing conference (PHC) statements were filed by PG&E and Cal Advocates, and jointly by TURN, FEITA and Mussey Grade.

On October 8, 2020, a telephonic PHC was held to address the service list, discuss the scope, schedule, and other procedural matters.

2. Scope

Based on the application, PHC statements and discussion during the PHC, the scope of issues to be addressed in these consolidated proceedings are as follows:

1. Whether PG&E's RAMP Report and analysis is complete and in compliance with D.14-12-025, D.16-08-018 and the S-MAP Settlement adopted in D.18-12-014.
2. Whether PG&E acted reasonably in the instances where it exercised discretion in implementing the requirements of the S-MAP settlement.
3. Whether there are gaps in identifying risks and considering mitigation options:
 - a. Whether key safety risks have been properly identified, assessed, and analyzed.
 - b. Whether risk analysis is adequately supported.
 - c. Whether effective mitigation programs have been developed and defined with sufficient granularity.
 - d. Whether cost effectiveness of mitigations has been reasonably assessed and analyzed.
 - e. Whether alternatives have been fully considered and adequately discussed.
 - f. Whether safety and other risks associated with PSPS have been fully and adequately considered.
4. Whether the Multi Attribute Value Function (MAVF) and RSE calculations are reasonable and consistent with the S-MAP settlement.
5. Whether PG&E's analysis is transparent and allows for independent validation of its results.
6. Whether RAMP feedback has been adequately incorporated into PG&E's Test Year (TY) 2023 GRC filing.
7. Whether the proceeding should be integrated into the TY 2023 GRC.

Issues considered may include assessing impacts on environmental and social justice communities, including the extent to which actions in this

proceeding impact achievement of any of the nine goals of the Commission's Environmental and Social Justice Action Plan.¹

In addition, although not specifically included in the list of scoping issues for this proceeding, parties may comment on whether PSPS should be viewed as a mitigation program for purposes of PG&E's current RAMP Report.

3. Need for Evidentiary Hearing

In Resolution 176-3465 dated July 16, 2020, the Commission preliminarily determined that evidentiary hearings are not required. Parties at the PHC agreed with this determination and this ruling affirms that hearings are not required.

4. Schedule

The following schedule is adopted but may be modified by the assigned Commissioner or ALJ as required to promote the efficient and fair resolution of these proceedings:

Event	Date
SPD files evaluation report	Nov 18, 2020
SPD workshop regarding SPD's report	Dec 1, 2020
Opening Comments on RAMP report and SPD report	Jan 15, 2021
Reply Comments	Jan 29, 2021
(additional workshops if needed)	TBD
PG&E incorporates RAMP feedback into its TY 2023 GRC filing	Ongoing through June 2021
PG&E files TY2023 GRC	By June 30, 2021
GRC PHC	July to Aug 2021

¹ Available here: <https://www.cpuc.ca.gov/CPUCNewsDetail.aspx?id=6442461331>.

Decision closing application and/or integrating into GRC	4 th Quarter 2021
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In any event, we intend that this proceeding will be resolved no later than 18 months from the filing of the application.

5. Category of Proceeding and *Ex-Parte* Restrictions

This proceeding was preliminarily categorized as ratesetting and hearings are not contemplated. There were no objections in the PHC statements or during discussion at the PHC regarding the categorization and need for hearings.

This ruling confirms the Commission's preliminary determination that this is a ratesetting proceeding (Resolution ALJ 176-3468) and that hearings are not required. Accordingly, *ex-parte* communications are restricted and must be reported pursuant to Article 8 of the Commission's Rules of Practice and Procedure.

6. Public Outreach

Pursuant to Pub. Util. Code § 1711(a), I hereby report that the Commission sought the participation of those likely to be affected by this matter by noticing it in the Commission's monthly newsletter. The newsletter is served on communities and businesses that subscribe to it and is posted on the Commission's website.

7. Intervenor Compensation

Pursuant to Pub. Util. Code § 1804(a)(1), an intervenor who intends to seek an award of compensation must file and serve a notice of intent to claim compensation by November 7, 2020, 30 days after the PHC.

8. Response to Public Comments

Parties may, but are not required to, respond to written comments received from the public. (*See* Pub. Util. Code § 1701.1(g).) Parties may do so by

posting such response using the “Add Public Comment” button on the “Public Comment” tab of the docket card for the proceeding.

9. Public Advisor

Any person interested in participating in this proceeding who is unfamiliar with the Commission’s procedures or has questions about the electronic filing procedures is encouraged to obtain more information at <http://consumers.cpuc.ca.gov/pao/> or contact the Commission’s Public Advisor at 866-849-8390 or 415-703-2074 or 866-836-7825 (TTY), or send an e-mail to public.advisor@cpuc.ca.gov.

10. Service of Documents on Commissioners and Their Personal Advisors

Rule 1.10 requires only electronic service on any person on the official service list, other than the ALJ.

When serving documents to Commissioners or their personal advisors, whether or not they are on the official service list, parties shall only provide electronic service. Parties must NOT send hard copies of documents to Commissioners or their personal advisors unless specifically instructed to do so.

11. Assignment of Proceeding

Commissioner Clifford Rechtschaffen is the assigned commissioner and Rafael Lirag is the assigned ALJ and presiding officer for the proceeding.

IT IS ORDERED that:

1. The scope, issues, and schedule are set forth in the body of this ruling, unless amended by a subsequent ruling or order by the Assigned Commissioner or ALJ.
2. The category of the proceeding shall be ratesetting. Hearings are not necessary.

3. *Ex-Parte* rules as set forth in Rules 8.1- 8.5 of the Commission's Rules of Practice and Procedure, and Pub. Util Code § 1701.3(c) apply.

4. Any party that expects to claim intervenor compensation for its participation in these proceedings must file its notice of intent to claim intervenor compensation by November 7, 2020.

5. ALJ Rafael Lirag is designated as the Presiding Officer in this proceeding.

6. The assigned Commissioner or assigned ALJ may modify the schedule, as required to promote the efficient and fair resolution of this proceeding.

This order is effective today.

Dated November 4, 2020, at San Francisco, California.

/s/ CLIFFORD RECHTSCHAFFEN

Clifford Rechtschaffen
Assigned Commissioner